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FILED

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**SECRETARY, BOARD OF
OIL, GAS & MINING**

Subject: Docket 2015-011, Cause 196-45 ---Objection to Fidelity's Motion for Dismissal Without Prejudice

I object to Fidelity Exploration and Production's Motion for Dismissal without Prejudice. The motion needs to include the requirement that Fidelity cannot perform any hydraulic fracking or well enhancement until the well to be fracked is connected to a gathering line to the Dead Horse Point Lateral Pipeline.

Fidelity Exploration and Production and the BLM in their EA (DOI-BLM-UT-Y010-2014-0115EA) Natural Gas Gathering Line System for the Dead Horse Point the Dead Horse Point Lateral Pipeline proposed to construct 19 gathering lines to 19 well pads to eliminate flaring in the Cane Creek Unit.

The 19 well pads that were to receive gathering lines are listed below in Table 2-1. Included among the 19 wells to receive gathering lines is well 32-1-25-19 (API 43-019-50037). Note this is one of the shortest gathering lines in the area.

Well 32-1-25-19 production was enhanced by fracking in November, 2014 and has flared since then far more gas than permitted under Utah Admin. Code Rule R649-3-20.

Fidelity must meet its commitment to the public by completing the 19 gathering lines and stop all flaring in the Big Flats Cane Creek Unit before they are allowed to do further fracking or hydraulic enhancement of any well in the area.

Flaring in view of two National Parks and a State Park partially destroys the park experience expected by the more than 500,000 visitors to the areas. The parks are the primary source of income to the residents and the businesses in Moab.

Data from (DOI-BLM-UT-Y010-2014-0115EA) Natural Gas Gathering Line System for the Dead Horse Point Lateral Pipeline

Gas Gathering Lines

The Operator proposes to construct, operate, maintain, and eventually decommission 19 gas gathering lines that would connect current and possibly future wells on 19 well pads in and near the Cane Creek Unit (CCU) to the DHL gas gathering pipeline for delivery to a natural gas processing plant near Blue Hills Road where the natural gas would be compressed and processed for liquids recovery.

Table 2-1: Alternative A - Gathering Line Lengths and Land Ownership

Gathering Line	Location	Federal Surface Length (feet)	State Surface Length (feet)	Total
Cane Creek (CC) 1-1	T25S-R19E, Sections 1, 2	1,364	989	2,353
Cane Creek 2-1	T25S-R19E, Section 2	0	4,326	4,326
Cane Creek Unit 2-1-25-18	T25S-R18E, Section 2	0	1,693	1,693
Cane Creek Unit 7-1	T26S-R19E, Section 13 T26S-R20E, Sections 7, 18	10,841 ¹	0	10,841 ¹
Cane Creek 8-1	T26S-R20E, Sections 8, 17, 18	4,293	0	4,293
Cane Creek Unit 12-1	T25S-R19E, Sections 11, 12	3,244	0	3,244
Cane Creek Unit 16-2	T25S-R18E, Sections 15, 16	1,037	2,133	3,170
Cane Creek Unit 17-1	T26S-R20E, 17, 18	7,967	0	7,967
Cane Creek Unit 18-1	T26S-R20E, Section 18	1,375	0	1,375
Cane Creek 24-1	T26S-R19E, Sections 13, 24	6,333	0	6,333
Cane Creek Unit 26-2	T25S-R19E, Sections 26, 27	10,503	0	10,503

Cane Creek Unit 28-2	T25S-R19E, Sections 27, 28	1,119	0	1,119
Cane Creek Unit 32-1-25-19	T25S-R19E, Section 32	0	2,535	2,535
Cane Creek 36-1-25-18	T25S-R18E, Section 36 T25S-R19E, Sections 27, 31-34	14,203	9,214	23,417
Cane Creek Unit 36-1	T25S-R19E, Section 36 T26S-R19E, Sections 1, 2	976	1,403	2,379
Kane Springs Federal 10-1	T24S-R18E, Sections 35, 36 T25S-R18E, Sections 2, 10, 11, 15	15,344	18,300	33,644
Kane Springs 19-1A-ST	T26S-R19E, Sections 13, 24 T26S-R20E, Sections 19, 30	12,832	0	12,832
Kane Springs Federal 27-1	T25S-R19E, Section 27	79	0	79
Kane Springs Federal 25-19-34-1	T25S-R19E, Section 34	1,538	0	1,538
Total Length by Surface Owner		93,048	40,593	133,641

Sincerely:

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